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9 (Additional Counsel for Plaintiffs Listed Below)

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

13 IN RE: PACQUIAO-MAYWEATHER
14 BOXING MATCH PAY-PER-VIEW
15 LITIGATION

MDL No. 2:15-ml-02639-RGK
(PLAx)

[MDL No. 2639]

16 This document relates to:
17 ALL CASES

**DECLARATION OF HART L.
ROBINOVITCH IN SUPPORT OF
PLAINTIFFS' RESPONSES IN
OPPOSITION TO THE
MAYWEATHER DEFENDANTS'
AND PACQUIAO DEFENDANTS'
MASTER RULE 12(B)(6)
MOTIONS TO DISMISS AND
SUPPORTING DOCUMENTS
(DOCS. 145 AND 146)**

(Assigned to the Honorable R. Gary
Klausner)

Courtroom: 850
Judge: Hon. R. Gary Klausner

Hearing Date: None Scheduled
Hearing Time: None Scheduled

28 DECLARATION OF HART L. ROBINOVITCH

1 I, Hart L. Robinovitch, declare as follows:

2 1. I am a Partner at Zimmerman Reed, LLP and am a member in good
3 standing of the State Bars of Arizona and Minnesota. Zimmerman Reed has offices
4 in Minneapolis, Minnesota, Scottsdale, Arizona and the Los Angeles area. I have
5 been admitted to this Court *pro hac vice* on behalf of Plaintiffs in the above-
6 captioned matter and pursuant to the Court's Order of December 11, 2015 (Doc. 61).
7 I was appointed Interim-Lead Counsel for Plaintiffs. I submit this declaration in
8 support of Plaintiffs' Responses in Opposition to the Mayweather Defendants' and
9 Pacquiao Defendants' Master Rule 12(B)(6) Motions to Dismiss and Supporting
10 Documents (Docs. 145 and 146, respectively). I have personal knowledge of the
11 statements contained herein and if called as a witness, I would testify thereto.

12 2. Attached as Exhibit 1 to this Declaration is a true and correct copy of
13 the Complaint at issue in *Showtime Networks Inc. v. Top Rank, Inc.*, Case No. 1:16-
14 cv-03904, filed on May 26, 2016, in the United States District Court for the
15 Southern District of New York. Dkt. No. 6 (the "Showtime Complaint").

16 3. Attached as Exhibit 2 to this Declaration is a true and correct copy of a
17 news article from The Guardian dated April 28, 2015, titled: "How Mayweather-
18 Pacquiao gives PPV cops a chance to make big money", available at
19 [https://www.theguardian.com/sport/2015/apr/28/floyd-mayweather-manny-](https://www.theguardian.com/sport/2015/apr/28/floyd-mayweather-manny-pacquiao-fight-pay-per-view-cops)
20 [pacquiao-fight-pay-per-view-cops](https://www.theguardian.com/sport/2015/apr/28/floyd-mayweather-manny-pacquiao-fight-pay-per-view-cops).

21 I declare under the penalty of perjury pursuant to the laws of the United
22 States and the State of California that the foregoing is true and correct.

23 Executed this 6th day of October, 2016 at Scottsdale, Arizona.

24
25 /s/ Hart L. Robinovitch

26 Hart L. Robinovitch
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